

LAW OFFICE OF  
ZACHARY MARGULIS-OHNUMA

July 8, 2020

**MEMO ENDORSED**

Via ECF

Hon. Sidney H. Stein  
Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

RE: U.S. v. Joseph DePaola, 19 Cr. 833

Dear Judge Stein:

This office represents Joseph DePaola in the above-captioned matter. I write to request a temporary modification of Mr. DePaola's conditions of release to permit him to travel to Orlando, Florida to pick up his new dog. Pretrial does not object to this request and the Government defers to Pretrial.

Mr. DePaola would like to travel by plane on July 20, 2020 from Newark to Orlando, Florida, where he will meet the dog breeder in the terminal of the airport. Mr. DePaola will then return to Newark by plane a few hours later. Mr. DePaola will not leave the airport while he is in Orlando. If his request is approved, Mr. DePaola will provide his specific flight details to Pretrial.

Mr. DePaola recognizes that Florida has been designated a high-risk state for the spread of COVID-19. Though he will only be in Florida for a few hours, Mr. DePaola is prepared to quarantine for a full 14 days upon his return to New Jersey.

Thank you for your attention to this case.

Very truly yours,


*Victoria Nicole Medley*

Victoria Nicole Medley

**Application granted.**

**Dated: New York, New York  
July 8, 2020**

CC: All counsel (ECF)  
Pretrial (via email)

SO ORDERED  
  
SIDNEY H. STEIN  
U.S.D.J.